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**UNITED STATES DISTRICT COURT
DISTRICT OF OREGON
PORTLAND DIVISION**

UNITED STATES OF AMERICA

Case No. 3:12-CR-00107-02-BR

v.

**GOVERNMENT'S MOTION FOR A
PROTECTIVE ORDER**

LATANISHA "Tay" BOOKER et. al.,

Defendant.

The United States of America, by S. Amanda Marshall, United States Attorney for the District of Oregon, through Leah K. Bolstad, Assistant United States Attorney (AUSA) for the District of Oregon, Assistant United States Attorney, respectfully moves for an order pursuant to Rule 16(d)(1), Fed. R. Crim. P., and the privacy protection measures mandated by 18 U.S.C. § 3509(d), to preclude the defense counsel of record and defense investigators and agents from copying, displaying or distributing any of the discovery provided by the government in the above captioned case.

This investigation involves a person under the age of eighteen years who is alleged to be a victim of a crime of sexual exploitation. The victim “K.W.” in Counts 4, 5, and 6 is an eighteen-year-old. Counts 5 and 6 allege that defendant Booker committed witness tampering and retaliation against witness K.W. Accordingly, the government hereby moves for an order pursuant to Rule 16(d)(1), Fed. R. Crim. P., and the privacy protection measures mandated by 18 U.S.C. § 3509(d), to prohibit the defendant from copying, displaying, reproducing, publishing or distributing of the discovery provided in this case.

The government further moves for an order that defendant’s counsel of record maintain complete custody and control over the protected material and all copies thereof including those made for use by those who are necessary to assist counsel of record during investigation and preparation for trial. The government further requests that the Court direct that defense counsel may not provide copies of discovery to defendant that include the full names or other identifying information or show images of one or both victims in this case (“K.W.” and “N.B.”), nor allow the defendant to have unsupervised access to such documents.

The government has consulted with the attorney for defendant, Assistant Federal Defender Amy Baggio. Ms. Baggio has no objection to an order protecting any affidavits, reports, and/or discovery provided by the government in this case, nor an order precluding the

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defense from providing copies of the discovery to defendant, because the case involves a person under the age of eighteen years who is alleged to be a victim of a crime of sexual exploitation or a witness to a crime committed against another person.

Dated this ____ day of March 2012.

Respectfully submitted,

S. AMANDA MARSHALL
United States Attorney

s/ Leah K. Bolstad
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